

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America)

v.)

Charles Cerone Turk)

DOB: 06/07/19xx)

SSN: 284-76-xxxx)

Defendant(s)

Case No.

1:14MJ -1224

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2012 in the county of Hamilton County in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC 1073


Offense Description

Flight to avoid prosecution

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Jason M. O'Brien (FBI)

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/24/14


Judge's signature

City and state:

Cincinnati, Ohio

Honorable Karen L. Litkovitz, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jason O'Brien, Task Force Officer, Federal Bureau of Investigation (FBI), Cincinnati, Ohio, United States Department of Justice, hereinafter referred to as the Affiant, being duly sworn, and states as follows:

1. The affiant is an Investigative or a Law Enforcement Officer of the United States within the meaning of Title 18, United States Code Section (USC), Section 2510(7); that is, an Officer of the United States who is empowered by law to conduct investigations of, and make arrests for offenses of Federal law.

2. The affiant is a Task Force Officer with the Federal Bureau of Investigation, and has been since September 2011. Affiant is also a Cincinnati Police Officer and has been since August 2002. Affiant's assignments have included investigations involving Violent Crimes, Drug Crimes and Organized Crimes. Affiant has also conducted numerous fugitive investigations.

3. The affiant is currently assigned to the Cincinnati Division of the FBI, working on the Southern Ohio Safe Streets Task Force. This investigation of cases concerning Unlawful Flight to Avoid Prosecution is among the responsibilities of the Affiant and other investigators assigned to that Squad.

4. On February 1, 2014, the Affiant was contacted by Detectives from the Cincinnati Police Department (CPD) Homicide Unit about Charles Cerone Turk, Black, Male, DOB:06/07/19xx SSN: 284-76-xxxx. CPD detectives informed the affiant about the details of the investigation, as follows.

5. On December 10, 2010, CPD began an investigation into the murder of Robert "Nana" Jones a known narcotics trafficker. A passerby noticed Jones body lying on the edge of a golf course and called 911. Jones was shot to death, then bound and wrapped up as if he had been transported to and dumped at the location. Upon notifying the family it was learned that Jones was last seen leaving the family residence on December 10, 2010 going to meet a neighbor with whom he has narcotics ties.

6. The investigation developed Charles Turk as the primary offender in the murder. It is believed that Mr. Turk murdered and dumped Robert Jones after he killed him, because Jones had supposedly assaulted Jones mother, "P. F." during a drug transaction.

7. It was not until May of 2011 that investigators developed enough probable cause to sign charges against Turk. On May 5, 2011, Detective Karaguleff obtained a Criminal Complaint, issued by the Hamilton County Common Pleas Court charging Turk with Tampering with Evidence in violation of Ohio Revised Code Section 2921.12. On June 14, 2011 Detective Karaguleff obtained an additional complaint charging Turk with an additional count of Murder in violation of Ohio Revised Code Section 2903.02.

8. Based on Source information, toll records and credit card billing information investigators believe that Turk is aware that he is wanted in connection with the 2010 murder of Robert Jones and has fled to Texas or Louisiana under an assumed name.

9. On February 5, 2014 Mark Piepmeier, The Chief Assistant Prosecuting Attorney of the Hamilton County Prosecutors Office wrote a letter to the FBI confirming that he was committed to extraditing and prosecuting Turk of Murder and Tampering with Evidence charges.

10. Based on the facts and circumstances stated above, as well as training and experience of the Affiant, there is probable cause to believe that Charles Cerone Turk fled the state of Ohio, to avoid the prosecution for one count of Murder in violation of Ohio Revised Code Section

2903.02 and one count of Tampering with Evidence in violation of Ohio Revised Code Section 2921.12.

Respectfully submitted,



Jason M. O'Brien
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me on Feb. 24, 2014



HONORABLE KAREN L. LITKOVITZ
UNITED STATES MAGISTRATE JUDGE